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NAME OF COMMITTEE (In Full)
Right to Rise USA

FEC IDENTIFICATION NUMBER
C00571372

Mailing Address 6230 Wilshire Blvd
PMB 1790

City	State	ZIP Code
Los Angeles	CA	90048

March 7, 2016

Kaitlin Seufert
Report Analysis Division
Federal Election Commission
999 E Street, N.W.
Washington, DC 20463

Identification Number: C00571372

Reference: 48-HOUR NOTIFICATION REPORT, FILED 01/09/2016

Dear Ms. Seufert:

This response pertains to the Reports Analysis Division's ("RAD") Request for Additional Information ("RFAI") dated January 31, 2016, concerning Right to Rise USA's ("RTR") 48-Hour Independent Expenditure Report filed on January 9, 2016. In the RFAI, RAD requests that RTR "amend the 48-Hour Report by providing the state" for national cable independent expenditures made on January 7, 2016. These were expenditures for national cable media production on the Fox News network that were not specific to any state. Unlike broadcast media made on a local-affiliate basis, these ads were aired to every Fox News cable subscriber nationwide. A combination of differing pricing models and the fact of national airing makes it impossible to itemize such costs on a per-state basis. We urge the Commission to provide clarity to groups participating in the 2016 Presidential primary elections and adopt a reasonable interpretive rule governing these types of national advertisements.

Please feel free to contact me if you have any additional questions concerning this matter.

Sincerely,

Charles R. Spies
Treasurer